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UNITED STATES DISTRICT COURT
 DISTRICT OF OREGON
 PORTLAND DIVISION

OREGON COUNCIL FOR THE
 HUMANITIES d/b/a OREGON
 HUMANITIES, a nonprofit corporation;
 FEDERATION OF STATE HUMANITIES
 COUNCILS, a nonprofit corporation,

Plaintiffs,

v.

UNITED STATES DOGE SERVICE, a
 component of the Executive Office of the
 President; AMY GLEASON, in her official
 capacity as Acting Administrator of the
 United States DOGE Service; NATIONAL
 ENDOWMENT FOR THE HUMANITIES,
 an independent federal agency, and its
 advisory council NATIONAL COUNCIL ON
 THE HUMANITIES; MICHAEL
 MCDONALD, in his official capacity as
 Acting Chairman of the National Endowment
 for the Humanities,

Defendants.

Civil No. 3:25-cv-00829-SI

**DECLARATION OF KAMERON
 PEREZ-VERDIA IN SUPPORT OF
 PLAINTIFFS' MOTION FOR
 PRELIMINARY INJUNCTION**

I, Kameron Perez-Verdia, hereby declare under penalty of perjury as follows:

1. I am over the age of 18 and have personal knowledge of the facts herein and am competent to testify thereto.
2. I am the President and CEO of the Alaska Humanities Forum (“AKHF”) and have had this position for nine years. AKHF is a member of the Federation of State Humanities Councils, plaintiff in this litigation.
3. On April 2, 2025, along with other state humanities councils across the country, AKHF received notification from the National Endowment for the Humanities (NEH) terminating all open grants including our anticipated Fiscal Year 2025 operating grant totaling \$1,092,678. On June 2, 2025, we were notified that NEH had rescinded the termination of the grant. However, they informed us that they would only pay out 50% of the operating grant approximately \$546,000. As a result, AKHF will only receive roughly half of the funding we were entitled to and had budgeted for, leaving us in an extremely difficult financial position.
4. The loss of this operating grant has significantly destabilized AKHF. NEH operating grants serve as the financial backbone for our organization, as they do for many state councils. We rely on these funds to deliver consistent programming across Alaska—a state more than two and a half times the size of Texas in land area—with many remote and rural communities, including hundreds of Alaska Native (Indigenous) villages. These communities face stark challenges, including high rates of poverty, food insecurity, and health disparities, exacerbated by limited infrastructure, economic opportunity, and the enduring effects of historical injustices.
5. In response to the grant termination, we have been forced to rely on reserve funds to maintain operations and fulfill commitments made in reliance on the NEH grant. Our financial future is now uncertain. In the near term, we face the prospect of defaulting on obligations such as long-term leases, exposing the organization to penalties, damages, and other liabilities due to inadequate funding.

6. We have already implemented pay reductions, reduced employee hours, and were forced to halt our hiring processes.

7. We have also made substantial cuts to our programming. For example, our *Story Works* program—which places volunteers in high school English classrooms to support student storytellers—has been severely impacted. These workshops operate across rural and urban Alaska and are aimed at youth mental health and suicide prevention. Alaska has one of the highest youth suicide rates in the nation, especially among Indigenous youth. Due to the NEH funding cuts, we have had to scale back most of this program and lay off three teaching fellows.

8. Another major loss involves our language preservation support. Alaska is home to members of 229 federally recognized tribes and speakers of 20 distinct Alaska Native languages, many of which are endangered. The Eyak language, for example, lost its last fluent speaker in 2008. Some remaining languages have fewer than 40 fluent speakers. NEH funding supported preservation efforts, including youth-led language programs designed to ensure these languages—and the histories and cultures they carry—are not lost.

9. We also had to cancel our *Kindling Conversations* program, which supported veterans across Alaska through facilitated dialogue and community-based resource kits. Alaska has the highest per capita veteran population in the United States, with over 10% of residents identifying as veterans. Our programming provided meaningful support for veterans returning home, including sessions for women in the military. This programming has now been discontinued.

10. AKHF has also played a critical role in supporting Alaska's required high school Alaska Studies course. Despite being mandatory statewide, the course lacks adequate curriculum, training, and materials. Earlier this month, AKHF convened educators and leaders from across Alaska—representing diverse political, cultural, and geographic backgrounds—to begin building new resources and training for teachers. The gathering was inspiring and full of momentum.

However, due to the NEH cuts, this work cannot continue. We will not be able to complete curriculum development or support statewide implementation.

11. Beyond programming losses, the NEH termination has damaged AKHF's relationships with partner organizations and communities. Many of the local organizations we fund had already begun projects when we were forced to pause or cancel grants. These disruptions are not just logistical—they represent a breakdown of trust. Community grants are one of the primary ways AKHF builds and sustains relationships throughout the state, and halting these grants midstream has had a strongly negative impact.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

DATED this 24th day of June 2025.



Kameron Perez-Verdia

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